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Attorneys for MICHAEL MARROQUIN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

and

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas & Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case
No. 19-30088 (DM)

Case No. 19-30088-DM

Chapter 11

RS No. LKW-002

Date: December 11, 2019

Time: 10:00 a.m.

Place: 450 Golden Gate Avenue, 16th Floor
San Francisco, CA

Judge: Honorable Dennis Montali

Objection Deadline: December 6, 2019
Time: 4:00 p.m. (Pacific Time)

DECLARATION OF LEONARD K. WELSH IN SUPPORT
OF MOTION TO ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO
PERMIT LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION

I, Leonard K. Welsh, declare:

1. I am an attorney at law admitted to practice law before all courts in the State of California. I am admitted to practice law in United States District Court for the Northern

1 District of California and I am the owner of the Law Offices of Leonard K. Welsh. The Law
2 Offices of Leonard K. Welsh is the attorney of record for Michael Marroquin ("Plaintiff") in the
3 above-referenced case.

4 2. Pacific Gas & Electric Company and PG&E Corporation ("Debtors") filed
5 Voluntary Petitions for Non-Individuals Filing for Bankruptcy ("the Petitions") on January 29,
6 2019 in the United States Bankruptcy Court for the Northern District of California after Plaintiff
7 filed a lawsuit against Pacific Gas & Electric Company ("PG&E") and others in the Kern
8 County Superior Court ("the Lawsuit"). Copies of the Petitions are included in the Exhibits to
9 Motion to Abstain and for Relief from Automatic Stay to Permit Lawsuit to Proceed to Trial and
10 Conclusion ("the Exhibits") on file herein as Exhibits "A" and "B".

11 3. I believe cause exists for modifying the automatic stay to permit the Lawsuit
12 proceed in the Kern County Superior Court. This is true because:

13 a. judicial economy will be promoted by allowing Plaintiff's claim against
14 PG&E and the other defendants named in the Lawsuit ("the Other Defendants") to be
15 tried and liquidated in one forum and one action,
16

17 b. the Lawsuit is At Issue and ready to proceed and to trial,

18 c. the issues involved in the Lawsuit are found exclusively in state law,

19 d. Plaintiff's claim against PG&E are inextricably connected with his claims
20 against the Other Defendants,

21 e. the Kern County Superior Court has stayed prosecution of the Lawsuit
22 until Plaintiff obtains relief from the automatic stay from the Bankruptcy Court, and
23

24 f. I know of no prejudice that will occur to PG&E or any other person if the
25 Motion is granted.
26
27
28

4. The foregoing statements are within my personal knowledge and I can testify competently thereto if called as a witness.

I declare under penalty of perjury that the foregoing statements are true and correct.

Date: November 1, 2019

/s/ Leonard K. Welsh
LEONARD K. WELSH